

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY, LLC, <i>et al.</i>, Debtors.¹	§ Chapter 11 § § Case No. 20-33948 (MI) § § (Jointly Administered)
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**DECLARATION OF CRAIG A. DUEWALL IN SUPPORT OF
BP EXPLORATION & PRODUCTION INC.'S MOTION FOR ENTRY OF
AN ORDER PURSUANT TO 11 U.S.C. § 362(d) AUTHORIZING RELIEF
FROM THE AUTOMATIC STAY TO COMMENCE
ARBITRATION AGAINST THE DEBTORS**

I, Craig A. Duewall, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a shareholder with Greenberg Traurig, LLP, which maintains an office for the practice of law at 1000 Louisiana Street, Suite 1700, Houston, Texas 77002. I am an attorney at law, duly admitted and in good standing to practice in the State of Texas and I am admitted to practice before the U.S. District Courts for the Northern, Southern, Eastern and Western Districts of Texas. I am admitted *pro hac vice* in the above-captioned chapter 11 cases to represent BP Exploration & Production Inc. ("BP").

2. I submit this Declaration in support of the *Motion for Entry of an Order Pursuant to 11 U.S.C. § 362(d) Authorizing Relief from the Automatic Stay to Commence Arbitration Against the Debtors*², (the "Motion to Lift Stay"), which is being filed concurrently herewith

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

² Capitalized terms used in this section but not otherwise defined herein shall have the same meanings as ascribed to them later in the Motion to Lift Stay.

in the above-captioned case.

3. The document attached to the Motion to Lift Stay as **Exhibit A1** is a true and correct copy of the Galapagos Area Loop Subsea Production System Construction and Operating Agreement, dated December 1, 2011, as amended from time to time, (the “LSPS OA”).

4. The document attached to the Motion to Lift Stay as **Exhibit A2** is a true and correct copy of the Dispute Resolution Procedure, which is Exhibit F to the LSPS OA.

5. The document attached to the Motion to Lift Stay as **Exhibit A3** is a true and correct copy of an excerpt of the Transcript from the Court’s April 9, 2021 Hearing, Page 27, Lines 17-19.

6. The document attached to the Motion to Lift Stay as **Exhibit A4** is a true and correct copy of an excerpt of the Transcript from the Court’s May 6, 2021 Hearing, Page 42, Lines 18-23.

7. The document attached to the Motion to Lift Stay as **Exhibit A5** is a true and correct copy of an excerpt of the Deposition Transcript of Mr. Michael Dane, Page 273, Lines 2-7.

8. The document attached to the Motion to Lift Stay as **Exhibit A6** is a true and correct copy of the letter sent from John H. Smith, Senior Vice President – Business Development for the Debtors, to Danielle Scott, Business Partner – Land for BP, on May 14, 2021.

9. The document attached to the Motion to Lift Stay as **Exhibit A7** is a true and correct copy of the letter sent from Danielle Scott, Business Partner – Land for BP to John H. Smith, Senior Vice President – Business Development for the Debtors on May 19, 2021.

10. The document attached to the Motion to Lift Stay as **Exhibit A8** is a true and correct copy of a letter from Paul R. Genender, counsel to the Debtors, to Craig Duewall, counsel to BP on May 21, 2021.

11. The document attached to the Motion to Lift Stay as **Exhibit A9** is a true and correct

copy of a letter from Craig Duewall, counsel to BP, to Paul R. Genender, counsel to the Debtors, on May 21, 2021.

12. The document attached to the Motion to Lift Stay as **Exhibit A10**, is a true and correct copy of letter from Paul R. Genender, counsel to the Debtors, to Craig Duewall, counsel to BP, on May 24, 2021.

13. I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Date: May 28, 2021
Austin, Texas

By: /s/ Craig A. Duewall
Craig A. Duewall

Counsel for BP Exploration & Production Inc.